

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**X CORP.,**

**Plaintiff,**

**v.**

**MEDIA MATTERS FOR AMERICA,  
et al.,**

**Defendants.**

**Civil Action No. 4:23-cv-01175-O**

**DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION,  
IMPROPER VENUE, AND FAILURE TO STATE A CLAIM**

Defendants Media Matters for America and Eric Hananoki (collectively, "Defendants") respectfully move the Court for an order dismissing the above-captioned case for lack of personal jurisdiction, improper venue, and failure to state a claim upon which relief can be granted. For the reasons stated in the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, and Appendix thereto, the Complaint should be dismissed entirely and with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6).

WHEREFORE, Defendants respectfully request dismissal of the Complaint.

Respectfully submitted,

Dated: February 6, 2024.

/s/ Andrew LeGrand

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*Counsel for Defendants Media Matters for America and Eric Hananoki*

**CERTIFICATE OF SERVICE**

On February 6, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Andrew LeGrand

Andrew LeGrand